

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through its Co-Directors Natasha Soto and Shaketa Redden and on behalf of its members; DORETHEA FRANKLIN; TANIQUA SIMMONS; DE'JON HALL; JOSEPH BONDS; CHARLES PALMER; SHIRLEY SARMIENTO; EBONY YELDON; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

v.

Civil No.: 1:18-cv-00719-CCR

CITY OF BUFFALO, NY; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

Defendants.

**STIPULATED MOTION FOR ADJOURNMENT
MOTION TO COMPEL DEADLINE**

The Parties respectfully move to amend the scheduling order to extend the motion to compel deadline by approximately two months from June 20, 2024 to August 16, 2024.

In support of this motion, the Parties state as follows:

1. Under the present schedule, the deadline to file motions to compel is June 20, 2024.

2. Since the Parties' last extension motion, the Parties have continued to work through voluminous supplemental discovery production. Supplemental production has included body camera footage, statements, GIVE grant reporting, and IAD files. Processing and submission of these files to Plaintiffs took longer than expected due to their large sizes.

3. Due to the voluminous production, Plaintiffs require additional time to analyze their requested production and to identify whether they require any further supplemental production.

4. Additionally, the Parties have agreed to an additional, limited 30(b)(6) deposition of BPD Chief William Macy. This deposition is set to take place in mid-July.

5. The Parties are working together to identify and produce any necessary supplemental production as efficiently and expeditiously as possible. The Parties continue to make significant progress towards completion; however, due to the complex nature of the claims and defenses and the time necessary to analyze and produce the requested voluminous records, the Parties require an extension of the motion to compel deadline.

6. Accordingly, the Parties respectfully request that the motion to compel deadline be extended from June 20, 2024 to August 16, 2024.

7. The Parties thank the Court in advance for its consideration of this request.

Dated: Buffalo, New York
June 18, 2024

/s/ Peter A. Sahasrabudhe

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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2024, the above Stipulated Motion for Adjournment of Discovery Deadlines was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Peter A. Sahasrabudhe

Peter A. Sahasrabudhe